

## NOTICE OF VIOLATION

### California Safe Drinking Water and Toxic Enforcement Act

February 19, 2020

This Notice of Violation (the "Notice") is provided to you pursuant to and in compliance with California Health and Safety Code Section 25249.7(d).

- For general information regarding the California Safe Drinking Water and Toxic Enforcement Act ("Proposition 65"), please see the attached summary prepared by California's Office of Environmental Health Hazard Assessment.
- This Notice is provided by Maria Elizabeth Romero, a concerned citizen of the State of California and resident of Monterey County.

#### **Description of Violation:**

- Violators: MedChemExpress LLC  
MedChemExpress USA  
Shanghai Haoyuan Chemexpress Co., Ltd.
- Time Period of Exposure: The violations have been occurring since at latest February 19, 2017, and are ongoing.
- Statutory Authority: This Notice is provided for failure to comply with the warning requirements of Proposition 65, found at California Health and Safety Code section 25249.6.
- Chemicals Involved: The chemicals involved in these violations are listed in Attachment B hereto, and have been identified by the State of California as causing cancer or reproductive harm.
- Type of Product: All products offered for sale by MedChemExpress LLC, MedChemExpress USA, and/or Shanghai Haoyuan Chemexpress Co., Ltd. (the "Noticed Parties") on the Web site at <https://www.medchemexpress.com> whose primary component is a chemical listed on Attachment B ("Covered Products").
- Description of Exposure: Student use of the Covered Products in academic laboratories results in human exposure to toxic chemicals via dermal contact, eye contact, ingestion, inhalation, and accidental injection. No clear and reasonable warning of toxicity is provided by the Noticed Parties in connection with the Covered Products.

**Resolution of Noticed Claim:**

Within the next 60 days, California's Office of the Attorney General and other government attorneys may choose to bring an enforcement action against you in this matter. After this time, Mrs. Romero will file a citizen enforcement lawsuit against you unless you agree in a binding written settlement to: (1) provide Proposition 65-compliant warnings to California residents prior to sales of products containing Listed Chemicals; (2) provide Proposition 65-compliant warnings on the labels of Covered Products sold to California residents (to protect end users); and (3) require that any entity involved in resale of Covered Products also provide compliant warnings – or to cease all sales to residents of California. Any settlement agreement will also contain an enforcement mechanism providing for substantial penalties in case of non-compliance. Please note that final resolution of this matter will be subject to the oversight and approval of public prosecutors.

**Contact Us:**

Please consider this a formal notice of anticipated litigation and demand that the Noticed Parties preserve all evidence related to sales of the Covered Products or to warnings of product toxicity, including sales records, Web pages, data sheets, written sales protocols and procedures, product labels, box labels, and internal correspondence. Any inquiries regarding this notice should be directed to Mrs. Romero's counsel, Benjamin D. Weston, with Agency D&L, 1968 South Coast Highway, Suite 1200, Laguna Beach, California 92651. Mr. Weston may be contacted by telephone at 650.250.5075, by facsimile at 650.206.9844 and by e-mail at [ben@agencydl.com](mailto:ben@agencydl.com).

*Enclosures:*

Appendix A (Noticed Parties only)  
Attachment B  
Certificate of Merit  
Proof of Service  
Factual Information (A.G. copy only)

## APPENDIX A

### OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

#### THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY

The following summary has been prepared by the California Office of Environmental Health Hazard Assessment (OEHHA), the lead agency for the implementation of the Safe Drinking Water and Toxic Enforcement Act of 1986 (commonly known as “Proposition 65”). A copy of this summary must be included as an attachment to any notice of violation served upon an alleged violator of the Act. The summary provides basic information about the provisions of the law, and is intended to serve only as a convenient source of general information. It is not intended to provide authoritative guidance on the meaning or application of the law. The reader is directed to the statute and OEHHA implementing regulations (see citations below) for further information.

FOR INFORMATION CONCERNING THE BASIS FOR THE ALLEGATIONS IN THE NOTICE RELATED TO YOUR BUSINESS, CONTACT THE PERSON IDENTIFIED ON THE NOTICE.

The text of Proposition 65 (Health and Safety Code Sections 25249.5 through 25249.13) is available online at: <http://oehha.ca.gov/prop65/law/P65law72003.html>. Regulations that provide more specific guidance on compliance, and that specify procedures to be followed by the State in carrying out certain aspects of the law, are found in Title 27 of the California Code of Regulations, sections 25102 through 27001.<sup>1</sup> These implementing regulations are available online at: <http://oehha.ca.gov/prop65/law/P65Regs.html>.

#### *WHAT DOES PROPOSITION 65 REQUIRE?*

***The “Proposition 65 List.”*** Under Proposition 65, the lead agency (OEHHA) publishes a list of chemicals that are known to the State of California to cause cancer and/or reproductive toxicity. Chemicals are placed on the Proposition 65 list if they are known to cause cancer and/or birth defects or other reproductive harm, such as damage to

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<sup>1</sup> All further regulatory references are to sections of Title 27 of the California Code of Regulations unless otherwise indicated. The statute, regulations and relevant case law are available on the OEHHA website at: <http://www.oehha.ca.gov/prop65/law/index.html>.

female or male reproductive systems or to the developing fetus. This list must be updated at least once a year. The current Proposition 65 list of chemicals is available on the OEHHA website at: [http://www.oehha.ca.gov/prop65/prop65\\_list/Newlist.html](http://www.oehha.ca.gov/prop65/prop65_list/Newlist.html).

Only those chemicals that are on the list are regulated under Proposition 65. Businesses that produce, use, release or otherwise engage in activities involving listed chemicals must comply with the following:

***Clear and reasonable warnings.*** A business is required to warn a person before “knowingly and intentionally” exposing that person to a listed chemical unless an exemption applies. The warning given must be “clear and reasonable.” This means that the warning must: (1) clearly make known that the chemical involved is known to cause cancer, or birth defects or other reproductive harm; and (2) be given in such a way that it will effectively reach the person before he or she is exposed to that chemical. Some exposures are exempt from the warning requirement under certain circumstances discussed below.

***Prohibition from discharges into drinking water.*** A business must not knowingly discharge or release a listed chemical into water or onto land where it passes or probably will pass into a source of drinking water. Some discharges are exempt from this requirement under certain circumstances discussed below.

#### ***DOES PROPOSITION 65 PROVIDE ANY EXEMPTIONS?***

Yes. You should consult the current version of the statute and regulations (<http://www.oehha.ca.gov/prop65/law/index.html>) to determine all applicable exemptions, the most common of which are the following:

***Grace Period.*** Proposition 65 warning requirements do not apply until 12 months after the chemical has been listed. The Proposition 65 discharge prohibition does not apply to a discharge or release of a chemical that takes place less than 20 months after the listing of the chemical.

***Governmental agencies and public water utilities.*** All agencies of the federal, state or local government, as well as entities operating public water systems, are exempt.

***Businesses with nine or fewer employees.*** Neither the warning requirement nor the discharge prohibition applies to a business that employs a total of nine or fewer employees. This includes all employees, not just those present in California.

***Exposures that pose no significant risk of cancer.*** For chemicals that are listed under Proposition 65 as known to the State to cause cancer, a warning is not required if the business causing the exposure can demonstrate that the exposure occurs at a level that poses “no significant risk.” This means that the exposure is calculated to result in not more than one excess case of cancer in 100,000 individuals exposed over a 70-year lifetime. The Proposition 65 regulations identify specific “No Significant Risk Levels” (NSRLs) for many listed carcinogens. Exposures below these levels are exempt from the warning requirement. See OEHHA's website at: <http://www.oehha.ca.gov/prop65/getNSRLs.html> for a list of NSRLs, and Section 25701 *et seq.* of the regulations for information concerning how these levels are calculated.

***Exposures that will produce no observable reproductive effect at 1,000 times the level in question.*** For chemicals known to the State to cause reproductive toxicity, a warning is not required if the business causing the exposure can demonstrate that the exposure will produce no observable effect, even at 1,000 times the level in question. In other words, the level of exposure must be below the “no observable effect level” divided by 1,000. This number is known as the Maximum Allowable Dose Level (MADL). See OEHHA's website at: <http://www.oehha.ca.gov/prop65/getNSRLs.html> for a list of MADLs, and Section 25801 *et seq.* of the regulations for information concerning how these levels are calculated.

***Exposures to Naturally Occurring Chemicals in Food.*** Certain exposures to chemicals that naturally occur in foods (i.e., that do not result from any known human activity, including activity by someone other than the person causing the exposure) are exempt from the warning requirements of the law. If the chemical is a contaminant<sup>2</sup> it must be reduced to the lowest level feasible. Regulations explaining this exemption can be found in Section 25501.

***Discharges that do not result in a “significant amount” of the listed chemical entering any source of drinking water.*** The prohibition from discharges into drinking water does not apply if the discharger is able to demonstrate that a “significant amount” of the listed chemical has not, does not, or will not pass into or probably pass into a source of drinking water, and that the discharge complies with all other applicable laws, regulations, permits, requirements, or orders. A “significant amount” means any detectable amount, except an amount that would meet the “no significant risk” level for chemicals that cause cancer or that is 1,000 times below the “no observable effect” level for chemicals that cause reproductive toxicity, if an individual were exposed to that amount in drinking water.

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<sup>2</sup> See Section 25501(a)(4).

## *HOW IS PROPOSITION 65 ENFORCED?*

Enforcement is carried out through civil lawsuits. These lawsuits may be brought by the Attorney General, any district attorney, or certain city attorneys. Lawsuits may also be brought by private parties acting in the public interest, but only after providing notice of the alleged violation to the Attorney General, the appropriate district attorney and city attorney, and the business accused of the violation. The notice must provide adequate information to allow the recipient to assess the nature of the alleged violation. The notice must comply with the information and procedural requirements specified in Section 25903 of Title 27 and sections 3100-3103 of Title 11. A private party may not pursue an independent enforcement action under Proposition 65 if one of the governmental officials noted above initiates an enforcement action within sixty days of the notice.

A business found to be in violation of Proposition 65 is subject to civil penalties of up to \$2,500 per day for each violation. In addition, the business may be ordered by a court to stop committing the violation.

A private party may not file an enforcement action based on certain exposures if the alleged violator meets specific conditions. For the following types of exposures, the Act provides an opportunity for the business to correct the alleged violation:

- An exposure to alcoholic beverages that are consumed on the alleged violator's premises to the extent onsite consumption is permitted by law;
- An exposure to a Proposition 65 listed chemical in a food or beverage prepared and sold on the alleged violator's premises that is primarily intended for immediate consumption on- or off-premises. This only applies if the chemical was not intentionally added to the food, and was formed by cooking or similar preparation of food or beverage components necessary to render the food or beverage palatable or to avoid microbiological contamination;
- An exposure to environmental tobacco smoke caused by entry of persons (other than employees) on premises owned or operated by the alleged violator where smoking is permitted at any location on the premises;
- An exposure to listed chemicals in engine exhaust, to the extent the exposure occurs inside a facility owned or operated by the alleged violator and primarily intended for parking non-commercial vehicles.

If a private party alleges that a violation occurred based on one of the exposures described above, the private party must first provide the alleged violator a notice of special compliance procedure and proof of compliance form.

A copy of the notice of special compliance procedure and proof of compliance form is included in Appendix B and can be downloaded from OEHHA's website at:  
<http://oehha.ca.gov/prop65/law/p65law72003.html>.

*FOR FURTHER INFORMATION ABOUT THE LAW OR REGULATIONS...*

Contact the Office of Environmental Health Hazard Assessment's Proposition 65 Implementation Office at (916) 445-6900 or via e-mail at  
[P65Public.Comments@oehha.ca.gov](mailto:P65Public.Comments@oehha.ca.gov).

Revised: May 2017

NOTE: Authority cited: Section 25249.12, Health and Safety Code. Reference: Sections 25249.5, 25249.6, 25249.7, 25249.9, 25249.10 and 25249.11, Health and Safety Code.

**Agency D&L**  
**MedChemExpress Notice of Violation**  
**February 19, 2020**

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**ATTACHMENT B**  
***List of Chemicals Sold by MedChemExpress***  
***in Violation of Proposition 65***

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<b>Chemical Name</b>	<b>CAS No.</b>	<b>Chemical Name</b>	<b>CAS No.</b>
Abiraterone acetate	154229-18-2	1,4-Butanediol dimethanesulfonate (Busulfan)	55-98-1
Acetazolamide	59-66-5	Butylated hydroxyanisole	25013-16-5
Acetohydroxamic acid	546-88-3	Caffeic Acid	331-39-5
Actinomycin D	50-76-0	Carbamazepine	298-46-4
Aflatoxins	---	Carboplatin	41575-94-4
All-trans retinoic acid	302-79-4	Chenodiol	474-25-9
Altretamine	645-05-6	Chlorambucil	305-03-3
Amantadine hydrochloride	665-66-7	Chloramphenicol sodium succinate	982-57-0
Amikacin sulfate	39831-55-5	1-(2-Chloroethyl)-3-cyclohexyl-1-nitrosourea (CCNU) (Lomustine)	13010-47-4
Aminoglycosides	---	Chrysene	218-01-9
Amiodarone hydrochloride	19774-82-4	C.I. Solvent Yellow 14	842-07-9
Amitraz	33089-61-1	Ciclosporin (Cyclosporin A; Cyclosporine)	59865-13-3; 79217-60-0
Amoxapine	14028-44-5	Cidofovir	113852-37-2
Amsacrine	51264-14-3	Cisplatin	15663-27-1
Anabolic steroids	---	Cladribine	4291-63-8
Angiotensin converting enzyme (ACE) inhibitors	---	Clarithromycin	81103-11-9
Anisindione	117-37-3	Clobetasol propionate	25122-46-7
Aristolochic acids	---	Clofibrate	637-07-0
Aspirin	50-78-2	Clomiphene citrate	50-41-9
Atenolol	29122-68-7	Colchicine	64-86-8
Auranofin	34031-32-8	Cycloheximide	66-81-9
Avermectin B1 (Abamectin)	71751-41-2	Cyclophosphamide (anhydrous)	50-18-0
Azacitidine	320-67-2	Cyclophosphamide (hydrated)	6055-19-2
Azaserine	115-02-6	Cytarabine	147-94-4
Azathioprine	446-86-6	D&C Red No. 19	81-88-9
Azobenzene	103-33-3	Dacarbazine	4342-03-4
Beclomethasone dipropionate	5534-09-8	Daminozide	1596-84-5
Benzo[a]pyrene	50-32-8	Dantron (Chrysazin; 1,8-Dihydroxyanthraquinone)	117-10-2
Bischloroethyl nitrosourea (BCNU) (Carmustine)	154-93-8	Daunomycin	20830-81-3



**Agency D&L**

MedChemExpress Att. B, page 2

February 19, 2020

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<b>Chemical Name</b>	<b>CAS No.</b>	<b>Chemical Name</b>	<b>CAS No.</b>
Daunorubicin hydrochloride	23541-50-6	Furazolidone	67-45-8
Diazoxide	364-98-7	Ganciclovir	82410-32-0
Di-n-butyl phthalate (DBP)	84-74-2	Gemfibrozil	25812-30-0
Dichlorophene	97-23-4	Gentian violet (Crystal violet)	548-62-9
Dichlorophenamide	120-97-8	Goserelin acetate	65807-02-5
Dicumarol	66-76-2	Griseofulvin	126-07-8
Di(2-ethylhexyl)phthalate (DEHP)	117-81-7	Halobetasol propionate	66852-54-8
Diethylstilbestrol (DES)	56-53-1	Haloperidol	52-86-8
Diflunisal	22494-42-4	Hydroxyurea	127-07-1
Dihydroergotamine mesylate	6190-39-2	Idarubicin hydrochloride	57852-57-0
Diltiazem hydrochloride	33286-22-5	Ifosfamide	3778-73-2
3,3'-Dimethoxybenzidine dihydrochloride	20325-40-0	Imazalil	35554-44-0
N,N-Dimethylacetamide	127-19-5	Isotretinoin	4759-48-2
Diphenylhydantoin (Phenytoin)	57-41-0	Leuprolide Acetate	74381-53-6
Diphenylhydantoin (Phenytoin), sodium salt	630-93-3	Levodopa	59-92-7
Direct Black 38 (technical grade)	1937-37-7	Lovastatin	75330-75-5
Doxorubicin hydrochloride (Adriamycin)	25316-40-9	Malathion	121-75-5
Estradiol 17B	50-28-2	Mancozeb	8018-01-7
Estragole	140-67-0	Mebendazole	31431-39-7
Estrone	53-16-7	Medroxyprogesterone acetate	71-58-9
Estropipate	7280-37-7	Megestrol Acetate	595-33-5
Ethinylestradiol	57-63-6	Melphalan	148-82-3
Ethionamide	536-33-4	Mercaptopurine	6112-76-1
Etodolac	41340-25-4	Mercury and mercury compounds	---
Etoposide	33419-42-0	Mestranol	72-33-3
Etretinate	54350-48-0	Methacycline hydrochloride	3963-95-9
Flunisolide	3385-03-3	Methimazole	60-56-0
Fluorouracil	51-21-8	Methotrexate	59-05-2
Flurbiprofen	5104-49-4	N-Methyl-N'-nitro-N-nitrosoguanidine	70-25-7
Flutamide	13311-84-7	Methylthiouracil	56-04-2
Fluticasone propionate	80474-14-2	Metronidazole	443-48-1
Folpet	133-07-3	Misoprostol	59122-46-2
Fumonisin B1	116355-83-0	Mitomycin C	50-07-7

**Agency D&L**

MedChemExpress Att. B, page 3

February 19, 2020

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<b>Chemical Name</b>	<b>CAS No.</b>	<b>Chemical Name</b>	<b>CAS No.</b>
Mitoxantrone dihydrochloride	70476-82-3	Prednisolone sodium phosphate	125-02-0
MON 13900 (furilazole)	121776-33-8	Primidone	125-33-7
Monocrotaline	315-22-0	Procarbazine Hydrochloride	366-70-1
Myclobutanil	88671-89-0	Progesterone	57-83-0
Nalidixic acid	389-08-2	Propoxur	114-26-1
Netilmicin sulfate	56391-57-2	Propylthiouracil	51-52-5
Nifedipine	21829-25-4	Pulegone	89-82-7
Nimodipine	66085-59-4	Pymetrozine	123312-89-0
Nitrofurantoin	67-20-9	Pyrimethamine	58-14-0
Nitrofurazone	59-87-0	Reserpine	50-55-5
Nitrogen mustard hydrochloride (Mechlorethamine hydrochloride)	55-86-7	Ribavirin	36791-04-5
Norethisterone acetate (Norethindrone acetate)	51-98-9	Rifampin	13292-46-1
Norethisterone (Norethindrone)/Ethinyl estradiol	68-22-4 / 57-63-6	Spirodiclofen	148477-71-8
Norethisterone(Norethindrone)/Mestranol	68-22-4 / 72-33-3	Spirolactone	52-01-7
Norgestrel	6533-00-2	Sterigmatocystin	10048-13-2
Oxadiazon	19666-30-9	Streptomycin sulfate	3810-74-0
Paclitaxel	33069-62-4	Streptozocin (streptozotocin)	18883-66-4
Penicillamine	52-67-5	Sulfasalazine (Salicylazosulfapyridine)	599-79-1
Pentostatin	53910-25-1	Sulindac	38194-50-2
Pertuzumab	380610-27-5	Tamoxifen and its salts	10540-29-1
Phenacetin	62-44-2	Tamoxifen citrate	54965-24-1
Phenazopyridine hydrochloride	136-40-3	Teniposide	29767-20-2
Phenolphthalein	77-09-8	Teriparatide	52232-67-4
Phenoxybenzamine hydrochloride	63-92-3	Thalidomide	50-35-1
Phenprocoumon	435-97-2	Thioguanine	154-42-7
Pimozide	2062-78-4	Thiophanate Methyl	23564-05-8
Pioglitazone	111025-46-8	Thiouracil	141-90-2
Pipobroman	54-91-1	Tobramycin sulfate	49842-07-1
Plicamycin	18378-89-7	Topiramate	97240-79-4
Pravastatin sodium	81131-70-6	Treosulfan	299-75-2

**Agency D&L**

MedChemExpress Att. B, page 4

February 19, 2020

<b>Chemical Name</b>	<b>CAS No.</b>
Triamterene	396-01-0
Trilostane	13647-35-3
Trimethadione	127-48-0
Tris(1-aziridiny)phosphine sulfide (Thiotepa)	52-24-4
Tris(1,3-dichloro-2-propyl) phosphate (TDCPP)	13674-87-8
Trypan blue (commercial grade)	72-57-1
Uracil mustard	66-75-1
Urethane (Ethyl carbamate)	51-79-6
Valproate (Valproic acid)	99-66-1
Vinblastine sulfate	143-67-9
Vincristine sulfate	2068-78-2
Vismodegib	879085-55-9
Warfarin	81-81-2
Zalcitabine	7481-89-2
Zidovudine	30516-87-1
Zileuton	111406-87-2

## **CERTIFICATE OF MERIT**

### **California Safe Drinking Water and Toxic Enforcement Act**

February 19, 2020  
(Romero v. MedChemExpress LLC et al.)

I, Benjamin D. Weston, hereby declare:

1. This Certificate of Merit accompanies the attached 60-day notice in which it is alleged the parties identified in the notices have violated California Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings.

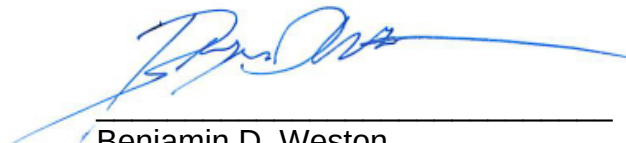
2. I am the attorney for the noticing party.

3. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the alleged exposures to the listed chemicals that are the subject of the action.

4. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiff's case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute.

5. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Respectfully submitted,



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Benjamin D. Weston  
Cal. Bar No. 240641

## Certificate of Service

I, Chris Johnson, hereby declare:

1. I am, and was at the time of service hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 498 Calle Principal, Monterey, California 93940.

2. On February 19, 2019, I served the following documents:

- 60-Day Notice of Violation (with Attachments A and B)
- Certificate of Merit

on MedChemExpress LLC and Shanghai Haoyuan Chemexpress Co., Ltd. by sending two copies of each document to the following address using the method described below:

Ann Grimaldi, Esq.  
Grimaldi Law Offices  
535 Mission Street, 14th Floor  
San Francisco CA 94105

3. On February 19, 2019, I served the following documents:

- 60-Day Notice of Violation (with Attachment B)
- Certificate of Merit

on each of the parties on the service list attached hereto by the method described below.

**BY MAIL:** I deposited such envelope in the mail at Monterey, California, with postage thereon fully prepaid. I am readily familiar with my company's practice of preparing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that service is presumed invalid if the postal cancellation date or postage meter date is more than one (1) day after date of my signature below.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: February 19, 2019

\_\_\_\_\_  
Chris Johnson

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I, Benjamin D. Weston, hereby declare:

1. I am, and was at the time of service hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business

address is 1968 South Coast Highway, Suite 1200, Laguna Beach, CA 92651.

2. On February 19, 2019, I served the following documents:

- 60-Day Notice of Violation
- Certificate of Merit

on the following persons by causing a true and correct .PDF copy thereof to be sent via electronic mail to the parties listed below, pursuant to Cal. Code Regs., title. 27, § 25903(c)(1):

Alameda County District Attorney <a href="mailto:CEPDProp65@acgov.org">CEPDProp65@acgov.org</a>	Calaveras County District Attorney <a href="mailto:Prop65Env@co.calaveras.ca.us">Prop65Env@co.calaveras.ca.us</a>
Contra Costa County District Attorney <a href="mailto:sgrassini@contracostada.org">sgrassini@contracostada.org</a>	Inyo County District Attorney <a href="mailto:inyoda@inyocounty.us">inyoda@inyocounty.us</a>
Lassen County District Attorney <a href="mailto:mlatimer@co.lassen.ca.us">mlatimer@co.lassen.ca.us</a>	Monterey County District Attorney <a href="mailto:Prop65DA@co.monterey.ca.us">Prop65DA@co.monterey.ca.us</a>
Napa County District Attorney <a href="mailto:CEPD@countyofnapa.org">CEPD@countyofnapa.org</a>	Riverside County District Attorney <a href="mailto:Prop65@rivcoda.org">Prop65@rivcoda.org</a>
Sacramento County District Attorney <a href="mailto:Prop65@sacda.org">Prop65@sacda.org</a>	San Diego City Attorney <a href="mailto:CityAttyProp65@sandiego.gov">CityAttyProp65@sandiego.gov</a>
San Diego County District Attorney <a href="mailto:CityAttyCrimProp65@sandiego.gov">CityAttyCrimProp65@sandiego.gov</a>	San Francisco County District Attorney <a href="mailto:gregory.alker@sfgov.org">gregory.alker@sfgov.org</a>
San Francisco City Attorney <a href="mailto:Valerie.Lopez@sfcityatty.org">Valerie.Lopez@sfcityatty.org</a>	San Joaquin County District Attorney DA <a href="mailto:DAConsumer.Environmental@sjcda.org">DAConsumer.Environmental@sjcda.org</a>
San Luis Obispo County District Attorney <a href="mailto:edobroth@co.slo.ca.us">edobroth@co.slo.ca.us</a>	Santa Barbara County District Attorney <a href="mailto:DAProp65@co.santa-barbara.ca.us">DAProp65@co.santa-barbara.ca.us</a>
Santa Clara County District Attorney <a href="mailto:EPU@da.sccgov.org">EPU@da.sccgov.org</a>	Santa Cruz County District Attorney <a href="mailto:Prop65DA@santacruzcounty.us">Prop65DA@santacruzcounty.us</a>
Sonoma County District Attorney <a href="mailto:jbarnes@sonoma-county.org">jbarnes@sonoma-county.org</a>	Tulare County District Attorney <a href="mailto:Prop65@co.tulare.ca.us">Prop65@co.tulare.ca.us</a>
Ventura County District Attorney <a href="mailto:daspecialops@ventura.org">daspecialops@ventura.org</a>	Yolo County District Attorney <a href="mailto:cfepd@yolocounty.org">cfepd@yolocounty.org</a>

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: February 19, 2019

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Benjamin D. Weston

## **List for Service by Mail**

Alpine County District Attorney  
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